



Town of Rocky Hill

761 OLD MAIN STREET • ROCKY HILL, CONNECTICUT 06067 • (860) 258-2700 • FAX (860) 258-7638

February 3, 2023

To Whom It May Concern,

My name is Logan Gauvin. I am a Certified Parks & Recreation Professional (CPRP) and Aquatics Facility Operator (AFO) through the National Recreation and Parks Association who currently serves at the Town of Rocky Hill's Parks and Recreation Department as Recreation Supervisor. Co-signing this testimony with me is Craig Bowman, who is also a CPRP through the National Recreation and Parks Association, who serves as Director of the Town of Rocky Hill's Parks and Recreation Department.

I am testifying today our Town's stance against raised bill number 6574- An Act Concerning Municipal Youth Camps with a statement of purpose reading "To specify that certain programs and activities advertised or operated by municipal departments shall be licensed as youth camps by the Office of Early Childhood."

An effort to repeal existing language that exempts municipalities from operating youth camp operations raises significant concern on how much research has been done by all involved with proposing this change regarding the extraordinarily negative impact this would have on towns and their communities state-wide. This is in addition to the existing hardships our towns are already enduring with record high inflation, and minimum wage increases that have amounted to significant financial challenges ultimately placing the burden on the tax payers.

The municipal exemption regarding youth camp operations clearly demonstrates how the private sector operations and municipal operations resources differ. Through the published Statutes and Regulations for Youth Camps, the content is designed to clearly define terms, expectations of administration and staffing, records, physical plan and program practices, health care and accommodations. While private entities must work to create and comply with these components, **municipalities have been equipped from the beginning with resources to address all of the above through:**

- Board of Educations
- Building Departments
- Emergency Management Departments (Public Safety, Police, Fire and EMS)
- Engineering Departments
- Finance Departments
- Health Departments
- Human Resources (including Risk Managers and Town Legal Teams)
- Human Services Departments
- Parks & Recreation Departments
- Public Works Departments

All of which provides layers of oversight of municipal youth camp operations topped off with other leaders including but not limited to; Town Mangers, Mayors, First Selectmen, Town





Councils and beyond. All of this combined differentiates the lack of existing resources for private sector operations compared to established municipal operations justifying the existing municipal exemption.

Repealing this exemption is not only a mistake, but certain to have a ripple effect of unprecedented circumstances. By removing this exemption, municipalities may face:

- **Unforeseen Medical Expenses:** while municipal camps go through extensive measures to ensure safe operations, they would take on significant medical expenses to comply with medical requirements.
 - For Example: *An APRN may start around \$45 an hour. A 5 day camp that operates for 8 hours a day for 7 weeks would have expenses starting at \$12,600. For a camp with on average 50 campers a week, they would have to increase fees by \$36 per child-per week just to off-set that added expense. And that's not including consultation hours the APRN will need for accommodating campers, reviewing health forms and individual care plans, and training staff on how to accommodate those campers. Even if you don't hire an APRN, a medical professional is going to require a retention fee to consult for them which will also amount to significant amounts.*
- **Unwelcomed State Fees:** municipalities will have to pay a hefty \$315 fee simply to submit their application for licensing (annually), but also inherit other state expenses such as for background checks through the OEC which amount to approximately \$88.25 per employee. Municipalities already have resources to complete such background checks attaining the same information at a fraction of that cost.
- **Increased Administrative Expenses:** municipal camps already have highly reputable and accountable registration systems in place. By repealing the exemption, municipalities will now have to spend more on administrative staffing to collect, review, organize and maintain hundreds of health forms annually.
- **Increased Hardships for Consumers:** in addition to having to place the newly added expenses municipalities will gain onto the consumers to off-set if this is repealed, it will also cause child care in Connecticut to become even less affordable which may leave hundreds of children without proper care simply due to expenses. Additionally, for those able to afford the child care still, frustrations will arise with the amount of paperwork that will need to be provided by families, especially those requiring unique medical accommodations. Information that they already provide to school systems, that youth camps cannot access due to HIPPA resulting in families having to literally double the amount of work they have to submit simply for their child to be enrolled. This of course is assuming all the paperwork is in-order (which often is not due to an oversight from a physicians office for example.) In these circumstances, those families now need to be turned away for reasons beyond their control due to the youth camp not being able to accommodate them as a direct result of licensing requirements.

I'd like to close my testimony by referencing the Town of Rocky Hill's existing experience through the OEC Youth Camp Licensing. The Town achieved licensing many years ago through



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the OEC and maintained it until recently when we decided to drop the licensing under the municipal exemption. While we still uphold the safe practices of our camp operations, there was no proven benefit to our tenure being a licensed youth camp operation. Only hardships.

To close this testimony, allowing the repeal of general statutes exempting municipalities from continuing to operate their youth camp operations without oversight of the OEC will cause an extraordinarily negative impact on towns and their communities state-wide.

Sincerely,

x

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